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6

7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
9

10 UNITED STATES OF AMERICA, ) No. CR 13-0071 EMC  
11 Plaintiff, )  
12 v. ) **STIPULATION AND [PROPOSED]  
13 LOY TSANG, ) ORDER TO CONTINUE SENTENCING  
14 Defendant. ) HEARING**  
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16 The parties hereby agree and stipulate to move the sentencing in Mr. Tsang's case from  
17 September 25, 2013 to March 12, 2014 at 2:30 p.m. The purpose of the requested continuance is  
18 to ensure that Mr. Tsang remains out of custody for the birth of his first child, a daughter. Mr.  
19 Tsang's wife is currently 18 weeks pregnant, and tests thus far reveal that the baby is healthy. The  
20 due date for the baby is in early February. A sentencing in the middle of March will ensure Mr.  
21 Tsang's presence for the delivery and the first few weeks of his child's life.

22 Mr. Tsang was indicted in this case on February 5, 2012. He was released on a \$150,000  
23 bond secured by property with supervision by U.S. Pretrial Services. To date, Mr. Tsang has been  
24 in full compliance with the terms and conditions of his release. He has completed the presentence  
25 report process and fully cooperated with U.S. Probation in providing all requested documentation  
26 and attending his presentence interview.

1 Probation Officer Leon Dang has been contacted by defense counsel, and has no  
2 objection to moving the sentencing to March, 2014. He further indicated to defense counsel that  
3 he is available any Wednesday in March 2014 and is in agreement with any date selected by the  
4 parties.

5 As indicated by his signature below, government counsel Andrew Scoble has no  
6 objection to continuing the sentencing to March 12, 2014 for the reasons stated.  
7

8 The parties accordingly request the Court to continue sentencing in this matter to March 12, 2014  
9 for the reasons stated.  
10

11 IT IS SO STIPULATED.  
12

13 Dated: September 18, 2013  
14

15  /s/  
16 ELIZABETH M. FALK  
17 ASSISTANT FEDERAL PUBLIC DEFENDER  
18

19 Dated: September 18, 2013  
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21  /s/  
22 ANDREW SCOBLE  
23 ASSISTANT UNITED STATES ATTORNEY  
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1                   **[PROPOSED] ORDER**

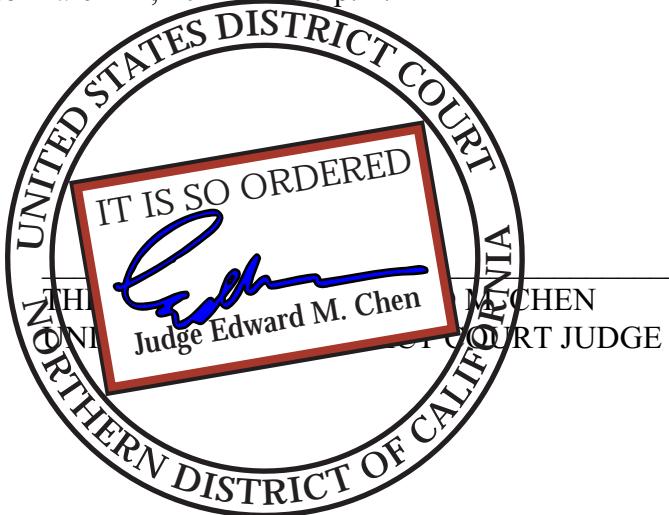
2                   For the reasons set forth above, the hearing in the aforementioned matter is hereby

3                   CONTINUED from September 25, 2013 to March 12, 2014 at 2:30 p.m.

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5                   **IT IS SO ORDERED.**

6                   DATED: 9/24/13



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